

UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION
Student Achievement and School Accountability Programs

June 2007 On-site Monitoring



South Dakota Department of Education

September 2007 Response



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September 28, 2007

Zollie Stevenson, Jr., Ph.D.
Acting Director
Student Achievement and School Accountability Programs
Office of Elementary and Secondary Education
US Department of Education
400 Maryland Ave., SW, Suite 3W226
Washington, DC 20202

Dear Mr. Stevenson, Jr.,

The South Dakota Department of Education is responding to the request to address findings of U. S. Department of Education's (ED) monitoring visit to South Dakota.

During the week of June 11, 2007, a team from the ED's Student Achievement and School Accountability Programs (SASA) office reviewed the South Dakota Department of Education's (SDDE) administration of the Title I, Part A; Even Start; Neglected or Delinquent; and Homeless Education programs. A report containing the findings and required corrective actions that the ED team cited as a result of the review was issued on August 16th and received by the SDDE on August 21, 2007.

The SDDE is submitting its response to the compliance issues identified in the report. A summary document provides the state's narrative response to the finding. Supporting evidence is cited and included as appropriate. We anticipate that ED will find the state's corrective action plan sufficient. Please contact the department's Title I Director, Diane Lowery, if further information is needed.

Sincerely,

Dr. Rick Melmer

02/04/2008

Title I Part A

Area: Standards, Assessments and Accountability

Indicator 1.3 - The SEA has published an annual report card as required and an Annual Report to the Secretary.

Finding: The SDDE's report card did not include all of the required information.

- The report card did not include information about the professional qualifications of teachers in the State, including percentage of such teachers teaching with emergency or provisional credentials, and the percentage of classes not taught by highly qualified teachers in the aggregate and disaggregated by high-poverty compared to low-poverty schools.
- Rather than the "high-poverty" compared to "low-poverty" distinction, for classes taught by highly qualified teachers, the State report card makes the distinction as 2006 "highest quartile" and 2006 "lowest quartile". No explanation is provided on the report of the distinction that is being made, nor the definition of the term "quartile" in a way that parents or the general public would understand.

Further action required: The SDDE must submit to ED a template of the State report card that includes the required language of the teacher quality comparison between high poverty to low poverty schools.

South Dakota's Response

Requested changes to the NCLB Report Card have been forwarded to the department's vendor. Once final AYP determinations are made after the appeals process, all revisions to the report card will be made. At that time, SDDE will provide ED with the link to the report card and a PDF file of the state, a district example, and a school example of the completed accountability reports.

Evidence

#1 Planned revisions to the accountability reports

Indicator 1.4 - The SEA has ensured that LEAs have published annual report cards as required.

Recommendation: The SDDE should work with its LEAs to ensure that LEA report cards and individual school reports include all the information required in the Statute. LEA report cards and individual school reports did not include all required information. LEA and school reports did not include the professional qualifications of teachers in the State, including the percentage of such teachers teaching with emergency or provisional credentials, and the percentage of classes not taught by highly qualified teachers, in the aggregate and disaggregated by high-poverty compared to low-poverty schools.

Further action required: The SDDE must submit to ED a template of the LEA report card that includes the appropriate language associated with the required comparison of highly qualified teachers at the district and school levels. When the LEAs report cards for Spring 2007 are completed, the SDDE must submit them to ED.

South Dakota's Response

Requested changes to the NCLB Report Card have been forwarded to the department's vendor. Once final AYP determinations are made after the appeals process, all revisions to the report card will be made. At that time, SDDE will provide ED with the link to the report card and a PDF file of the state, a district example, and a school example of the completed accountability reports.

Evidence

#1 Planned revisions to the accountability reports

Indicator 1.5 The SEA indicates how funds received under Grants for State Assessments and related activities (section 6111) will be or have been used to meet the 2005-06 and 2007-08 assessment requirements of NCLB.

Finding: Although the SDDE provided a cost breakdown between activities for development and other supportive activities, information pertaining to how funds received under Grants for State Assessments and related activities (section 6111) will be or have been used to meet the 2005-06 and 2007-08 assessment requirements of NCLB was requested but not provided during visit.

Further action required: The SDDE must provide the requested information on the use of section 6111 funds to ED for review.

South Dakota's Response

The department provided a cost break down for FY06 Section 6111(1) (\$1,994,228.97) and Section 6111(2) (\$2,720,472.20) for a total of \$4,714,701.17. 07-08 funding is anticipated to be used for 6111 (1) activities only.

During the on-site review, DOE staff explained use of the 6111 expenditures relative to the technical assistance provided by the ESAs (Educational Service Agencies). The reviewers were provided with documents that demonstrated the use of the funds with ESAs to provide professional development to schools under (2) (F & H). Staff explained how each ESA is required to provide a work plan that explains how the funds would be used (an example document was provided) and the type of professional development required by SDDE. In addition, reviewers asked to see documentation of the number of data retreats held which the ESAs supplied.

SDDE requires ESAs to work with local education agencies under (2)(F) to:

(F) Strengthening the capacity of local educational agencies and schools to provide all students the opportunity to increase educational achievement, including carrying out professional development activities aligned with State student academic achievement standards and assessments.

ESAs were contracted to provide the following objectives which specifically address 6111 activities:

Objective #1: Provide technical assistance to all school district identified for school improvement and encourage all school districts to adopt the school improvement model. Any school identified as not meeting Adequate Yearly Progress will be contacted by the regional ESA to offer services to include, but are not limited to:

- a. facilitate the designing and implementation of a school improvement plan using the model adopted by the State,
- b. data analysis of test scores, and reporting of testing information.,
- c. serve in coordination to the school support team,
- d. Provide technical assistance in implementing regulations regarding NCLB.

Objective #2: Continue to provide professional development opportunities for all public school districts addressing:

- a. curriculum mapping training using Tech Paths software to map local curriculum with state standards,
- b. 6 + 1 writing assessment training,
- c. coordination of professional development opportunities related to training of Math and Science standards designed by DOE.

Objective #3: Provide school districts training in best practices instructional teaching models.

Objective #4: Provide school districts training in the use of best practices for classroom assessments and the use of formative data.

Evidence

#2 6111 Activity Breakdown

Monitoring Area: Instructional Support

Indicator 2.3 - The SEA ensures that LEAs and schools meet parental involvement and parental notification requirements.

Finding (1): The SDDE did not consistently ensure that the notification letters of school choice to parents included all of the required components. For example, school choice letters reviewed by the ED team for schools did not include one or more of the following required components: the school's academic level; information on the academic achievement of those schools or a comparison to the student's current school; a statement that transportation would be provided; and a description of how parents can be involved in addressing the academic issues that led to the school being identified for improvement.

Further action required: The SDDE must provide LEAs additional written guidance on the requirements of the notices to parents of children attending schools identified for improvement, corrective action, or restructuring. The guidance must include a checklist of requirements and a sample of a parent notification letter that must include all the required components that the LEA

and/or principals may use to develop their notification letters. The sample school choice letter must include the required components under section 1116(b)(6) of the ESEA, including an explanation of the school status, the identification of the schools to which a child may transfer, and information on the academic achievement of the school or schools to which the child may transfer. The SDDE must provide a copy of this guidance and sample letter to ED.

South Dakota's Response

The SDDE has developed a Public School Choice (PSC) homepage which includes guidance as to what is needed in the parent notification letters. Example letters have been included on this website. Furthermore, the SDDE conducted a parent notification meeting via video conferencing (DDN - Digital Dakota Network) on August 7, 2007. Emails were sent to districts with presentation documents attached. Those documents included: the PowerPoint presentation, the parent notification requirements, and sample letters.

Districts are required to email draft copies of parent notifications letters to the SDDE for verification that all necessary information has been included. Once the letters have been deemed satisfactory, the district then mails the letter to parents prior to the first day of school. A copy of the parent letter is also mailed to the SDDE.

Evidence

- #3 PSC website (paper copy included) - <http://doe.sd.gov/oess/title/1Abasic/PSC.asp>
- #4 Email informing districts about Parent Notification Meeting
- #5 Email with documents that were attached
- #6 School Improvement / Parent Notification PowerPoint (PSC website)
- #7 School Improvement Letter Requirements (also found on PSC website)
- #8 7 Sample choice letters (also found on PSC website)

Finding (2): The SDDE has not consistently ensured that schools receiving Title I funds conduct an annual Title I meeting for parents.

Further action required: The SDDE should provide written guidance to all schools receiving Title I funds on the requirement to hold an annual parent meeting and what that meeting should address. The SDDE must submit to ED a copy of the guidance.

South Dakota's Response

The SDDE has given written guidance through the Title Update newsletter to all schools receiving Title I funds on the requirement to hold an annual parent involvement meeting. SDDE will monitor the implementation of this requirement through its monitoring process. A question about the annual meeting will be added to the Consolidated Application for the 2008-09 school year.

Evidence

- #9 2007 Title Fall Update
- #10 ESEA Program Monitoring

Finding (3): The SDDE did not ensure that schools have school level parental involvement policies for the 2006-2007 school year. Many parents indicated that they did not know about school parental involvement policies. The SDDE previously identified this problem through the monitoring activities conducted by the Title I office, but at the time of the review the issue had not yet been addressed.

Further action required: The SDDE must provide ED with documentation that all LEAs receiving Title I funds have been informed that they must require schools to develop a school parental involvement policy developed with parents and disseminated to them. Additionally, the SDDE must provide to ED documentation of the follow-up provided due to the monitoring activities conducted by SDDE related to this finding.

South Dakota's Response

The SDDE has given written guidance through the Title Update to all schools receiving Title I funds on the requirement to develop a school parental involvement policy that contains all required information, developed with input from parents, and disseminated annually to parents. SDDE is collecting parent involvement policies from the Sioux Falls School District (SFSFSD) and Andes Central School District (ACSD) to ensure that the changes requested based upon the department's on-site monitoring process have been made. School policies will be submitted to ED once they are in an acceptable format. SDDE will more closely monitor parent involvement policies through its revised monitoring procedure that ensures examination of parent involvement policies once in a three year cycle for all districts.

Evidence

- #9 2007 Title Fall Update
- #10 ESEA Program Monitoring

Finding (4): The SDDE did not ensure that all LEAs provided to parents the specific AYP determination, or school improvement status, by the beginning of the school year, though the information was released to the LEAs by the end of August. The specific AYP information was not shared with parents until the schools' newsletters were sent out in mid-October. An initial letter was sent out at the beginning of the school year related to offering school choice but did not include specific improvement status information and was unclear on whether or not students could take advantage of the choice option. Due to the missing elements, parents did not have all the pertinent information necessary about their school and the reasons why school choice was provided.

Further action required: The SDDE must submit to the LEAs, and provide a copy to ED, guidance that explains that the school improvement status information needs to be provided to parents before the first day of school. Additionally, the SDDE must provide to ED a detailed plan and timeline outlining how the Sioux Falls School District will send out notification with the specific AYP determinations in the appropriate timeline for the upcoming school year.

South Dakota's Response

The SDDE conducted a Parent Notification meeting via video conferencing (DDN - Digital Dakota Network) on August 7, 2007. During the meeting, districts were instructed to email a

draft copy of their parent notification letters to SDDE for verification that all information was included prior to sending them to parents. It was also stressed that the parent notification letter must be sent to parents prior to the start of school. Once the letters have been deemed okay by SDDE staff, districts then mailed the letter to parents prior to the first day of school. A copy of the letter is also mailed to the SDDE.

The SDDE provided onsite technical assistance on August 14, 2007 to the Sioux Falls School district in regards to the parent notification letter. The Sioux Falls School District then emailed copies of those letters to SDDE for further verification that all the required information was included. SDDE received mailed copies of these letters prior to the start of school at the same time that parents would have received the letter.

Evidence

- #3 Pubic School Choice website - <http://doe.sd.gov/oess/title/1Abasic/PSC.asp>
- #11 Email with draft copy of letters
- #12 Copies of the Sioux Falls School District notification letters
- #13 Email verifying that letters must be sent to SDDE for approval
- #6 School Improvement/Parent Notification PowerPoint (also found on PSC website)

Indicator 2.4 - The SEA ensures that schools and LEAs identified for improvement, corrective action, or restructuring have met the requirements of being so identified.

Finding (1): The SDDE has not consistently ensured that school improvement plans included all components such as an assurance that 10 percent will be spent on professional development; incorporating a teacher mentoring program; and specifying the responsibilities of the school, the LEA, and the SEA serving the school under the plan.

Further action required: The SDDE must develop and implement a plan with a detailed timeline for providing technical assistance to LEAs on developing or revising school improvement plans so that the plans meet the statutory requirements. The plans must also address monitoring activities conducted by the SDDE to ensure that subsequent plans include all components.

South Dakota's Response

SDDE requires that components such as the 10% set aside for professional development, teacher mentoring, and state, district, and school responsibilities are addressed in the school improvement plans. The requirement for schools in levels 1 and 2 of school improvement to set aside 10% of its school allocation for professional development is also addressed in the district's Consolidated Application through a narrative section and reflected in the Title I budget. With the passage of NCLB, SDDE turned over the responsibility for approval of school improvement plans to the LEAs as required [regulations 200.41(d)]. However, do to the findings of the ED monitoring, SDDE will revert back to its pre-NCLB practice of requiring all school improvement and schoolwide plans to be submitted to the assigned School Support Team (SST) member who will scrutinize the plan to ensure that all required components of both school improvement and schoolwide plans, as applicable, are included in the written plan. Any plan that is found to be unacceptable will be returned to the LEA and school for revisions. Once the plans are found to be in acceptable form, the SST will send a signed form to SDDE that recommends the plan be accepted. The LEA must approve the

school improvement plans prior to their submission to SDDE. SDDE will make the final determination that all components are included in the plan before giving final approval to the plan. Title I staff will assure compliance with all plan requirements prior to the approval of the school's application for school improvement funds.

Evidence

- #14 Sample SI Section of the Consolidated Application
- #15 SI Plan Requirements
- #16 Plan Framework
- #17 SI / SW Plan Criteria Checklist
- #18 School Improvement PowerPoint
- #19 School Improvement email
- #20 Timeline for plan approval

Finding (2): The SDDE uses a consolidated plan for the schoolwide plan and the school improvement plan. The ED team noted a lack of specificity in the school plans, and it was unable to determine what specific actions were being taken or how the strategies included in the plans related to the objectives. As a result, it was not clear how the plans were used to guide and govern changes in teaching and learning to improve student achievement or how the schoolwide program could be annually evaluated as required to determine its effectiveness in increasing student achievement and making changes as necessary based on the results of the evaluation.

Further action required: The SDDE must submit to ED written procedures for a review of schoolwide school improvement plans to ensure that the goals, strategies, and activities described in the plans, including any supporting documentation, adequately address the individual needs of each school and also meet State and Federal requirements. The review must also examine the quality of plans to determine that the goals and strategies directly address the academic achievement problems of the school and are of the nature to effectively meet the student progress goals described in the plans. The SDDE must provide a copy of the plan to annually evaluate the schoolwide and school improvement program to ED along with a detailed timeline outlining the activities of the annual evaluation.

South Dakota's Response

SDDE will increase its oversight of improvement and schoolwide plans. Because of the comprehensiveness of this finding, the response will be divided into sections to respond to issues related to schoolwide plans, school improvement plans, and plan evaluations.

Schoolwide

SDDE will continue its practice of having schools planning a schoolwide program work with their SST member. SST members will scrutinize the plan to ensure that all required components of schoolwide plans are included in the written plan. Any plan that is found to be unacceptable will be returned to the LEA and school for revisions. Once the plans are found to be in acceptable form, the SST will send a signed form to the SDDE that recommends the plan be accepted. The LEA must approve the schoolwide plans prior to their submission to SDDE. SDDE will make the final determination that all components are included in the plan before giving final approval of the plan.

SDDE will more closely monitor schoolwide plans through its revised monitoring procedure that ensures examination of schoolwide plans and evaluations once in a three year cycle for all districts. The annual evaluation form will be completed by each schoolwide program and included in the school's schoolwide plan.

School Improvement

LEAs and schools will be required to submit all school improvement plans to the assigned SST member. SST will scrutinize the plan to ensure that all required components of both school improvement and schoolwide plans, as applicable, are included in the written plan. Any plan that is found to be unacceptable will be returned to the LEA and school for revisions. Once the plans are found to be in acceptable form, the SST will send a signed form to the SDDE that recommends the plan be accepted. The LEA must approve the school improvement plans prior to their submission to SDDE. SDDE will make the final determination that all components are included in the plan before giving final approval of the plan. Title I staff will assure compliance with all plan requirements prior to the approval of the school's application for school improvement funds.

Evaluation

All districts and schools are required to conduct a comprehensive needs assessment using the adopted Data RetreatSM process. Individual needs of the school and student groups are identified and the results used to inform both the improvement plan and classroom instruction. The annual evaluation form is completed during this comprehensive needs assessment process for schoolwide and school improvement plans. Evaluations for school improvements plans are required to be submitted to SDDE each year.

Technical Assistance

SDDE Title I staff request technical assistance from ED and its providers related to this finding. SDDE staff, SST, and Committee of Practitioners feel it is imperative that schools operate under one plan; thus the consolidated plan for school improvement and schoolwide programs. ED guidance for schoolwide programs dated March 2006, page 22, indicates that "schools should operate under a single plan if at all possible". SDDE took this initiative in the early years of NCLB improvement and feel that it has been a step in the right direction. Assistance is requested to help us move this approach forward. Annual evaluation of both schoolwide and school improvement plans has been required. Other than the increased oversight planned for the next year, SDDE is unsure of additional steps to take. Technical assistance is sought.

Evidence

- #21 SW program planning timeline
- #22 SW plan components
- #23 Improvement and Schoolwide Plan Approval forms
- #10 ESEA Monitoring Process
- #24 Evaluation Forms for SW and SI
- #25 SW Evaluation documents
- #18 School Improvement PowerPoint
- #20 Timeline for plan approval

Indicator 2.6 - The SEA ensures that requirements for the provision of supplemental educational services (SES) are met.

Finding (1): The SDDE has not consistently ensured that districts implementing SES have agreements that outline student level learning objectives and were established jointly by the parents, LEA, and SES provider. SES providers determined the goals and objectives for the students with no discernable coordination with the LEA or parents. .

Further action required: The SDDE must provide written guidance that describes a detailed plan and timeline ensuring that LEAs know that agreements for student learning objectives meet the Title I requirements and how the SDDE will monitor to ensure that the requirements are fulfilled.

Additionally, if an LEA and a provider agree that the providers will work with parents to identify the learning objectives without the LEA in attendance, then the LEA must review those objectives. For additional information, please see information about SES and tools to help States and LEAs to implement the requirements, including examples of student learning plans, is available at ED's website at . <http://www.ed.gov/adminstcommlsuppsvcslsesprogramsreportpg8.htmJ>.

South Dakota's Response

SDDE hosted an SES Conference for both providers and districts on August 7, 2007. Guidance was given to both the providers and districts as to what is required when developing student learning plans and who should be involved in the development of these plans. The PowerPoint presentations can be found on the SDDE Supplemental Educational Services (SES) webpage. FERPA requires confidentiality of student's family poverty. This requirement has hindered the involvement of teachers and principals in the development of the student learning plans and progress reporting. To overcome this obstacle, districts have been instructed to get parent permission to share information about their child's involvement in SES with teachers and principals through the registration for SES form.

Further guidance is provided in the SDDE Supplemental Educational Services (SES) Guidance and Toolkit. A draft copy of this guidance and toolkit was provided to districts and providers at the SES Conference both in hard copy and on a disk, and can also be found on SDDE's SES website. This document will be reviewed by the Committee of Practitioners (COP) at the November 2007 meeting.

Districts are required to send to SDDE a copy of a student learning plan for each provider as soon as the student learning plans have been developed. Emails will be sent to the districts reminding them of the necessary documentation that is required to be sent to SDDE. Onsite monitoring of both districts and providers will be conducted throughout the year by SDDE staff and SDDE contracted personnel.

Evidence

- #26 SES Conference (District) PowerPoint
- #27 SES Conference (Provider) PowerPoint
- #28 SDDE SES Guidance and Toolkit (draft)
- #29 SES website - <http://doe.sd.gov/oess/title/1Abasic/SES.asp>

Finding (2): The SDDE did not ensure that the teachers of students participating in SES were regularly informed of their students' progress. Even though it may be addressed in the contract, there was no evidence of regular communication between the students' teachers and SES providers.

Further action required: The SDDE must provide technical assistance to LEAs and SES providers in order to fulfill this requirement that teachers are regularly informed of student progress. The SDDE must submit to ED a plan and detailed timeline of conducting these technical assistance activities, as well as documentation that these activities were conducted.

South Dakota's Response

An SES Conference was hosted by the SDDE in which both district personnel and SES providers participated. A participant sign-in sheet was kept. Information about the implementation of SES was covered which included keeping parents, teachers and principals informed about the progress of students. FERPA requires confidentiality of student's family poverty. This requirement has hindered the involvement of teachers and principals in the development of the student learning plans and progress reporting. To overcome this obstacle, districts have been instructed to get parent permission to share information about their child's involvement in SES with teachers and principals through the registration for SES form. The SDDE SES Guidance and Toolkit was handed out in both hard copy and on disk to all districts to help with the SES requirements. This document can also be found on the SDDE SES website. SDDE will be conducting onsite monitoring visits to districts and providers. Additional technical assistance will be provided at that time.

Evidence

- #28 SDDE SES Guidance and Toolkit (draft)
- #29 SDDE SES website - <http://doe.sd.gov/oess/title/1Abasic/SES.asp>
- #30 SES Agenda and Conference participants
- #26 SES Conference (District) PowerPoint
- #27 SES Conference (Provider) PowerPoint
- #31 SES (Free Tutoring) Registration form (by district)

Monitoring Area: Fiduciary

Indicator 3.3 - SEA ensures that all its LEAs comply with the requirements in section 1113 of the Title I statute and sections 200.77 and 200.78 of the regulations with regard to (1) Reserving funds for the various set-asides either required or allowed under the statute, and (2) Allocating funds to eligible school attendance areas or schools in rank order of poverty based on the number of children from low-income families who reside in an eligible attendance area.

Finding: The on-line application does not allow for a determination that reservations have been calculated properly and include the required elements. For example, the current application shows the one percent set aside for parental involvement and required reservation for professional development, but the on-line application does not demonstrate that the calculations for equitable services are calculated and reserved according to statutory requirements. The SDDE makes a determination that fiscal requirements have been met during its onsite reviews;

however, onsite reviews are not conducted every year for every LEA. The SDDE must ensure that these fiscal requirements are met before awarding Title I, Part A funds to its LEAs.

Further action required: The SDDE must provide a plan to ED that indicates how it will implement a process that determines whether LEAs are complying with basic Title I fiscal requirements on an annual basis prior to the time it awards Title I funds. The SDDE must also ensure through a documented process that LEAs are complying with basic Title I fiscal requirements on an annual basis before the time it awards Title I funds.

South Dakota's Response

To ensure compliance for school year 2007-08 the SD DOE used the *LEA Worksheet to Determine the Amount of Title I Funds for Equitable Services* from US Ed's Title I Resource Tool Kit for Ensuring Equitable Services to Private School Children. The worksheet was revised to include a signature line for LEAs to sign a certification statement that the equitable amounts were offered to the private schools. This worksheet was sent to the LEAs, with participating private schools, that reserved applicable district level Title I funds. SDDE is requiring these LEAs to return the signed worksheet certifying the equitable amounts were offered to the private schools before the LEA's application for SY 2007-08 is approved.

To ensure compliance in future years SDDE will work with its electronic grant system (eGrant) developer so the eGrant system will calculate the equitable private school share from the amounts they reserved at the LEA level according to statutory requirements.

Evidence

#32 Letter to Districts 8.9.07

#33 LEA Worksheet to Determine the Amount of Title I Funds for Equitable Services

Indicator 3.8 - SEA complies with the requirement to establish a Committee of Practitioners (COP) and involves the committee in decision-making as required.

Finding: The SDDE did not ensure that its COP complied with the membership requirements of the ESEA. The SDDE's current COP does not include representatives of the private school community as required.

Further action required: The SDDE must document the membership of the COP in order to ensure compliance with the requirements detailed in section 1903(b)(2)(A)-(G) of the ESEA, and provide ED with documentation that it has a fully-constituted COP that includes all required members.

South Dakota's Response

The SDDE has had one representative from private schools on the COP since its formation. It is now understood that ED's interpretation requires more than one representative to be on the committee. Recruitment efforts are underway to secure a second representative from a private school that participates in the Title I program for its eligible students. SDDE expects to have full representation for its scheduled November 27, 2007 COP meeting. A COP roster indicating representation will be provided to ED when it is complete.

Title I Part B, Subpart 3 (Even Start)

Monitoring Area: Instructional Support

Indicator 2.2 - Each program assisted shall include the identification and recruitment of eligible families.

Finding: The Pierre Even Start project consistently serves fewer than 10 families, while the project application references 25-30 families. At the time of the monitoring visit, the Pierre Even Start project was serving only nine families. Failure to recruit and serve the number of families referred to in the approved application has been a continuing issue identified in performance reports and monitoring visits conducted by the SDDE staff., but this issue had not been addressed at the time of the review.

Further action required: The SDDE must provide ED with evidence that the Pierre Even Start project has recruited and is serving at least 25 eligible families as described in the approved application.

South Dakota's Response

SDDE is working with the Pierre Even Start project to ensure they are recruiting and serving the number of eligible families as stated in their current application. The current amended application states that 10-12 eligible families will be served. SDDE has consulted with the Pierre Even Start project and will support their efforts to maintain this enrollment decrease from the previous application with consideration given to the extreme decrease in Even Start funds allocated.

Evidence

#34 Approved grant amendment

Indicator 2.3 - Each program assisted shall implement all 15 program elements.

Finding (1): The Pierre Even Start project was providing home visits, but they did not have lesson plans for these visits and no information was available documenting that these home visits supported the instructional services provided through Even Start.

Further action required: The SDDE must develop, submit to ED, and implement a plan to ensure that local projects provide integrated instructional services through home-based programs.

South Dakota's Response

SDDE has met with program staff from the Pierre Even Start project to discuss this finding and develop a plan to ensure that integrated instructional services to participating parents and children through home-based programs. SDDE will provide a contracted consultant to work directly with the Pierre Even Start project to ensure appropriate services are provided.

Follow up monitoring will occur to ensure continued improvement. Dr. Laurie Wenger,

Assistant Professor of Education at Augustana College will be the consultant working with the Pierre Even Start program.

Evidence

#35 Home Visit Lesson plan provided by the Pierre Even Start project

Finding (2): One of the early childhood education teachers paid partially with Even Start funds has a Bachelor's degree in nursing. While this teacher is working on a Child Development Associate certificate, she does not have an associate's degree in an area related to the area in which she is teaching.

Further action required: The SDDE must provide ED with evidence that all instructional staff in the Pierre Even Start project meet the staff qualification requirements in the statute.

South Dakota's Response

In the current approved application, the staff person in question is not paid out of Even Start funds. The staff that are currently being paid out of Even Start funds meet the qualifications necessary to the area they are teaching/working.

Evidence

#36 Budget from the current application with current staff

Indicator 2.5 - The local programs shall use high-quality instructional programs based on scientifically based reading research for children and adults.

Finding: The Pierre Even Start project did not include an early childhood education component that was high-quality, and it did not appear to be based on scientific research. The classroom environment was not print rich, there was a distinct absence of children's books and other literacy resources in the classroom, and the instructional program was not focused on early literacy and language development.

Further action required: The SDDE must provide ED with evidence that it has provided assistance and direction to the Pierre Even Start project and that the Pierre Even Start project is implementing an early childhood component that is of high quality and is based on scientifically based reading research. .

South Dakota's Response

SDDE has met with program staff from the Pierre Even Start project to discuss this finding and develop a plan to ensure that an early childhood education component that is of high quality and is based on scientifically based reading research. SDDE will provide a contracted consultant to work directly with the Pierre Even Start project to ensure appropriate services are provided. Follow up monitoring will occur to ensure continued improvement. Dr. Laurie Wenger, Assistant Professor of Education at Augustana College will be the consultant working with the Pierre Even Start program.

Monitoring Area: SEA Fiduciary Responsibilities

Indicator 3.2 - The SEA ensures that subgrantees comply with requirements on uses of funds and matching. .

Finding: The Sioux Falls Even Start project included several unallowable costs in its calculation for the match requirement. For example, it included the value of leased space using the fair market value of the space even though the space is owned by the grantee. (The value of space owned by any partner in the grant must be calculated using the depreciation and use formula). The project also included some staff that work part time in the program but the staff do not maintain personnel activity records. Finally, although the Sioux Falls project did not have a negotiated indirect cost rate, it did have a negotiated administrative cost rate and included some of these costs as part of the match requirement. It is unclear if these administrative costs are comparable to indirect costs, which are unallowable costs for Even Start.

Further action required: The SDDE must ensure that local projects understand how to document the correct matching share and that all costs included in the match are allowable. The SDDE must submit to ED an action plan for how it will provide guidance and training to address this concern. It must also submit documentation that the Sioux Falls Even Start project is only using allowable costs in meeting its cost share requirement.

South Dakota's Response

Information was shared with all Even Start programs regarding match documentation. Handouts on Support of Salaries and Wages and Rental/Lease Costs Summary were given to each program via email August 14, 2007. The Sioux Falls program has revised the match documentation to include only allowable costs.

Evidence

- #37 Adjusted match for the Sioux Falls Even Start program
- #38 Email with attachments
- #39 Support of Salaries and Wages
- #40 Rental/Lease Costs Summary

Title I, Part D

Monitoring Area: Accountability

Indicator 1.1 - The SEA has implemented all required components as identified in its Title I, Part D (N/D) plan.

Finding: The ED team found that the SDDE Part D plan included in the Consolidated Application is a one-page matrix with 2 goals (academic and vocational) and related performance Indicators, Objectives and Data Source. A more detailed plan for implementing Part D was not available for review. Section 1414 (a) of the ESEA outlines goals and program components that are required for implementation of Part D, which should be part of the Plan, and

provide the basis for Part 1 and Part 2 Applications and agreements related to implementation. Staff from the SAs interviewed were not aware of the State's Part D program goals.

Further action required: ED requires that the SDDE identify its goals and objectives as outlined its 2002 application and transmit this information to applicant SAs under Subpart 1. The SDDE must require SA applications to identify how their Title I, Part D program will meet the goals and objectives of the State plan.

South Dakota's Response

SDDE will review the 2002 application and identify the goals and objectives and transmit this information to the applicants for Subpart 1 funds prior to December 1. A copy of the letter sent to the Subpart 1 programs will be provided to USDE prior to December 1, 2007. A section will be added to the 2008-2009 SA application informing the SA of the state goals and objectives and requiring them to identify how their program will meet the goals and objectives of the State plan. A copy of the addendum to the Subpart 1 application will be forwarded to USDE prior to February 1, 2008.

Indicator 1.2 - The SEA ensures the State Agency (SA) plans for services to eligible N/D students meet all requirements

Finding (1): The ED team found that the Department of Human Services Center at Yankton does not offer the required 20 hours of instruction. The facility offered 14 hours of academic instruction, and the Center may not be a State accredited school program.

Further action required: ED requires the SDDE to investigate if the Department of Human Service programs receiving funding for Part D services are eligible institutions that meet Part D statutory requirements. ED requires the SDDE to send a report to ED with its finding regarding eligibility.

South Dakota's Response

The SD Department of Human Services was listed on the monitoring schedule to be monitored during the 2007-2008 school year. Monitoring of Subpart 1 and Subpart 2 programs are listed on the same schedule. This schedule was provided to the reviewer prior to the monitoring. SDDE will schedule the monitoring visit of the Department of Human Services earlier than planned and conduct the on-site review prior to December 31, 2007. A report on the findings regarding the eligibility of SD Department of Human Services will be sent to USDE by January 1, 2008.

Finding (2): The ED team found that the SDDE has not sufficiently conducted monitoring of the Title I, Part D, Subpart 1 program grantees to ensure that they are meeting all requirements. In review of SA Subpart 1 programs there was no evidence of the SDDE conducted compliance monitoring activities for the SA programs. ED did not observe a monitoring protocol or a monitoring schedule.

Further action required: The SDDE must provide a plan to ED that indicates how it will (1) . implement a monitoring process that determines whether the Title I, Part D Subpart I programs

are complying with Part D requirements; and (2) provide ED with information on how it has carried out, or how it will carry out comprehensive monitoring to ensure that Subpart I programs implement appropriate requirements.

South Dakota's Response

SDDE will develop a monitoring protocol to address all Title I Part D Subpart I requirements prior to December 1, 2007. A copy of the monitoring protocol will be sent to USED by December 1, 2007. SDDE had informed both of the Subpart 1 agencies in April 2007 that their programs would be monitored during the 2007-2008 school year. A copy of the monitoring letter sent to the Department of Human Services and the Department of Corrections will be sent to USED at the completion of the monitoring and before May 31, 2008.

McKinney-Vento Homeless Education Program

Monitoring Area: Instructional Support

Indicator 2.1 - The SEA implements procedures to address the identification, enrollment, and retention of homeless students.

Finding: The ED team found that the SDDE has continued to review and revise policy as indicated in its State plan submitted in 2002. However, ED found no evidence of an SEA policy that specifically addressed the identification, retention and enrollment of homeless students.

Further action required: ED requires that the SDDE review the State plan submitted to ED in 2002 and identify, revise, or add, as appropriate, policies and procedures that address the enrollment and retention in school of homeless children and youth.

South Dakota's Response

SDDE will review the 2002 State plan prior to May 2008. SDDE will seek input from within the department, LEAs, LEAs with subgrants, and the Committee of Practitioners in the review and revision of the plan, policies and procedures. A draft copy of a new plan will be submitted to USED prior to March 1, 2008 and the final plan will be submitted to USED prior to July 1, 2008.

Monitoring Area: Fiduciary

Indicator - 3.1 - The SEA ensures that LEA subgrant plans for services to eligible homeless students meet all requirements.

Finding: The ED team found that some LEAs use Part A funds to support transportation of homeless students. Additionally, one LEA (Rapid City) with a subgrant pays for 100% of the liaison's salary with Part A funds.

Further action required: The SDDE must inform LEAs in the State that transportation of homeless children and youth may not be paid for using Federal funds provided under Title I, Part A of the ESEA. Additionally, ED requires that the SDDE inform all LEAs with subgrants that Part A funds may be used to pay for a portion of a liaison's salary (less than 100 %) as long as the liaison has additional duties and responsibilities under Part A.

South Dakota's Response

SDDE sent a letter to each district homeless liaison in August 2007 informing them that Title I funds may not be used for the transportation of homeless students. The consolidated applications for 2007-2008 were scrutinized to ensure that no district indicated that funds may be used for transportation and, if this was stated, the district was informed. An article was included in the fall issue of the Title I Update that addressed the issue of transportation. This newsletter was sent to each district superintendent.

SDDE informed the LEA with a subgrant using Part A funds for the salary of the homeless liaison of the issue and this has been rectified. A copy of the letter to the Sioux Falls district will be sent to USDE after completion and prior to October 15, 2007. We have one other funded district that currently does not use Title I Part A funds for the liaison's salary. This district will also be informed of the proper use of Part A funds for the homeless coordinator's salary. A copy of the Rapid City Consolidated Application 2007-2008 Section Title I Part A will be forwarded to USED when approved by SDDE prior to December 1, 2007.

Evidence

#41	August letter to each district liaison
#9	Fall Title Update

Evidence of Implementation of Corrective Action Plans

Indicator	Finding	Documentation	Timeline
Title I Part A			
1.3	State report card	Report Template	Sept. 2007
		NCLB Report Card	Oct. 2007
1.4	LEA report card	Report Template	Sept 2007
		NCLB Report Card	Oct. 2007
1.5	6111 funds	List of activities	Sept. 2007
2.3	Notification letters	Website, emails, PPT, samples	Sept. 2007
	Annual Title I meeting	Title Update, Monitoring Process	Sept. 2007
		Monitoring Document	Oct. 2007
		Revised Consolidated Application	Feb. 2008
	School PI policies	Title Update, Monitoring Process	Sept. 2007
		PI policies from SFSD & ACSD	Oct. 2007
		List of documents for desk review	Oct. 2007
	AYP & SI status	Website, letters, email, PPT	Sept. 2007
2.4	SI plan components	Consolidated app SI section, SI plan documents, PPT, email	Sept. 2007
	Consolidated SW and SI Plans	Monitoring process, Evaluation forms, Planning process, PPT	Sept. 2007
2.6	Student Learning Plans	PPT, toolkit, website	Sept. 2007
		Email	Oct. 2007
		student learning plan	Dec. 2007
		monitoring document	Jan. 2007
	Student reports to parents	Toolkit, website, agenda, part. List, PPT, tutoring registration forms	Sept. 2007
		Monitoring process	Jan. 2007
3.3	Equitable Services	Letter, worksheet	Sept. 2007
3.8	COP membership	COP Roster	Nov. 2007
Title I Part B, Subpart 3 (Even Start)			
2.2	Id and requirement of eligible families	Grant amendment	Sept. 2007
2.3	Integrated instructional services	Home visit lesson plan	Sept. 2007
	Even Start staff qualifications	Application budget	Sept. 2007
3.2	Use of Even Start Funds	Sioux Falls Even Start adjusted match doc., Email, Support of Salaries and Wages document, Rental/Lease Costs Summary	Sept. 2007
3.8	COP membership	COP Roster	Nov. 2007
Title I, Part D			
1.1	Part D plan	SA letter	Dec. 2007
		SA addendum	Dec. 2007
1.2	Title I Part D - statutory	SD DHS findings report	Jan. 2008

	requirements		
	Title I Part D, Subpart A - Monitoring	Monitoring Protocol	Dec. 2007
		DHS & DOC Monitoring letter	June 2008
McKinney-Vento Homeless Education program			
2.1	SEA policy	Draft State Plan	March 2008
		Final State Plan	July 2008
3.1	Use of Title I Part A funds	Letter, Title Update newsletter	Sept. 2007
		Rapid City Consolidated Application	Dec. 2007
		Letter to Sioux Falls	Oct. 15, 2007